

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, *et al.*,

Plaintiffs,

-v.-

DEUTSCHE BANK
AKTIENGESELLSCHAFT, *et al.*,

Defendants.

No. 1:21-CV-04400 (KAM) (RML)

DECLARATION OF ANDREW J. FINN

ANDREW J. FINN makes the following declaration under penalty of perjury:

1. I am a member in good standing of the Bar of this Court and am a partner of Sullivan & Cromwell LLP, attorneys for defendants Standard Chartered Bank, Standard Chartered PLC, and Standard Chartered Bank (Pakistan) Limited in the above-captioned action. I respectfully submit this Declaration in support of the Standard Chartered Defendants' Motion To Dismiss the Amended Complaint and to place certain documents before this Court.

2. Attached hereto are true and correct copies of the following:

Foreign Terrorist Organizations, U.S. DEP'T STATE,
<https://www.state.gov/foreign-terrorist-organizations>

Exhibit 1

Written Agreement by and Among Standard Chartered
PLC, Standard Chartered Bank, Standard Chartered Bank
New York Branch, Federal Reserve Bank of New York,
and New York State Banking Department (Oct. 7, 2004)

Exhibit 2

Stipulation and Settlement Agreement Between the United
States of America and Hikmatullah Shadman, Rohullah
Faizy, and Najibullah Sadullah, *United States v. Sum of*
\$70,990,605, No. 1:12-cv-01905 (D.D.C. Feb. 22, 2019),
ECF No. 345-1

Exhibit 3

Verified Complaint for Forfeiture in Rem, <i>United States v. Sum of \$70,990,605</i> , No. 12-cv-1905 (D.D.C. Nov. 20, 2012), ECF No. 3	Exhibit 4
Adam Luck, <i>Whistleblower Says Bank Has Blood on Its Hands: RAF Veteran Claims Standard Chartered Helped Iran Terrorists, Ahead of Court Battle</i> , THIS IS MONEY (Sept. 7, 2019)	Exhibit 5
Richard Holmes, et al., <i>Standard Chartered's Iran Problems Didn't Go Away</i> , BUZZFEED NEWS (Sept. 21, 2020)	Exhibit 6
Pre-Motion Conference Transcript, <i>Wildman v. Deutsche Bank AG</i> , No. 1:21-cv-04400 (E.D.N.Y. Dec. 7, 2021)	Exhibit 7
Amended Complaint, <i>Zobay v. MTN Grp Ltd.</i> , No. 21-cv-03503 (E.D.N.Y. Feb. 9, 2022), ECF No. 52	Exhibit 8

Executed on March 18, 2022, in New York, New York.

/s/ Andrew J. Finn
Andrew J. Finn